

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF PENNSYLVANIA
PITTSBURGH DIVISION**

**IN RE: Renee R. Kline,
Debtor.**

**CASE NO.: 20-20081-JAD
Chapter 13**

**AMENDED RESPONSE TO INTERIM NOTICE OF CURE OF ARREARS
(Docket No. 73)**

NOW INTO COURT, through undersigned counsel, comes secured creditor, Wilmington Savings Fund Society, FSB, d/b/a Christiana Trust, not individually but as trustee for Pretium Mortgage Acquisition Trust (“Secured Creditor”), and files its response to the Interim Notice of Cure of Arrears (Docket No. 73), and in support thereof, represents the following:

Secured Creditor agrees the Trustee has disbursed pre-petition arrears.

DATED: May 31, 2024

Respectfully submitted by,
/s/ Michelle L. McGowan
Michelle McGowan, Esq.
**Robertson, Anschutz, Schneid, Crane & Partners,
PLLC**
130 Clinton Rd #202, Fairfield, NJ 07004
**Attorney for Wilmington Savings Fund Society,
FSB, d/b/a Christiana Trust, not individually but
as trustee for Pretium Mortgage Acquisition Trust**

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on May 31, 2024, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, and a true and correct copy has been served via United States Mail to the following:

Renee R. Kline
2109 Victoria Avenue
Arnold, PA 15068

And via electronic mail to:

Rodney D. Shepherd
River Park Commons
2403 Sidney Street, Suite 208
Pittsburgh, PA 15203

Ronda J. Winnecour
Suite 3250, USX Tower
600 Grant Street
Pittsburgh, PA 15219

Office of the United States Trustee
1000 Liberty Avenue
Suite 1316
Pittsburgh, PA 15222

By: /s/ Michelle L. McGowan